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6 Attorneys for Defendants
7 COFFEE SHOP, LP dba COFFEE SHOP and Penny
8 Pickett, Trustee of the Living Trust of Nellie J.
Prentice dated May 2, 1988, as amended on June 29,
1989 and April 13, 1993

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FRANCISCA MORALEZ.

Plaintiff,

v.

COFFEE SHOP, LP. dba COFFEE SHOP,
et al.,

Defendants.

Case No. 4:17-CV-02912-HSG

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS TO FILE A RESPONSIVE
PLEADINGS AND TO EXTEND
DEADLINE TO CONDUCT GENERAL
ORDER 56 JOINT SITE INSPECTION;
ORDER**

Complaint filed: May 22, 2017

1 Plaintiff Francisca Moralez (“Moralez”) and Defendants Coffee Shop LP dba Coffee
2 Shop (“Coffee Shop”) and Penny Pickett, Trustee of the Living Trust of Nellie J. Prentice dated
3 May 2, 1988, as amended on June 29, 1989 and April 13, 1993 (“Landlord”) (collectively,
4 “Defendants,” and together with Moralez, “the Parties”), by and through their respective counsel,
5 hereby stipulate and agree as follows:

6 1. This matter arises out of Moralez’s claim that she was discriminated against by
7 Defendants on account of her disability when she encountered conditions at Defendants’
8 business that she alleges interfered with her full and equal access thereto in violation of Title III
9 of the Americans with Disabilities Act (“ADA”). This matter therefore proceeds under this
10 District’s General Order 56 which governs ADA access matters.

11 2. The Scheduling Order issued under General Order 56 (Dkt. 5) requires that the
12 Parties, and their consultants (if desired), participate in a joint site inspection of the subject
13 property on or before September 5, 2017.

14 3. As of September 5, 2017, Defendants have engaged and are now represented by
15 Perkins Coie LLP. Prior to September 5, Coffee Shop was proceeding in pro per and was
16 representing the interests of the Landlord. The Parties have been working on a settlement of all
17 claims raised in the litigation. The Parties respectfully request that the Defendants’ deadline to
18 respond to the Complaint be extended to September 12, 2017, and the deadline to complete the
19 joint site inspection be extended from September 5, 2017 to October 11, 2017. As such, the
20 Parties have agreed to conduct the joint site inspection on October 11, 2017 at 1:00 p.m. in order
21 to afford the Parties additional time needed to finalize a settlement and, if necessary, to allow the
22 Parties sufficient time thereafter for the site inspection.

23 4. The Parties also respectfully request that all other dates triggered by the joint site
24 inspection be continued accordingly, including the date of the Case Management Conference and
25 the deadline to submit a case management conference statement to the Court. Specifically, the
26 Parties agree the Case Management Conference set for September 12, 2017 can be continued and
27 suggest a date after October 11, 2017.

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1 DATED: September 5, 2017

PERKINS COIE LLP

2 By: /s/ Aaron J. Ver
3 Sue J. Stott
4 Aaron J. Ver

5 Attorneys for Defendants
6 COFFEE SHOP, LP dba COFFEE SHOP; and
7 Penny Pickett, Trustee of the Living Trust of
8 Nellie J. Prentice dated May 2, 1988, as
9 amended on June 29, 1989 and April 13, 1993

10 DATED: September 5, 2017

MISSION LAW FIRM, A.P.C.

11 By: /s/ Zachary M. Best
12 Tanya E. Moore
13 Zachary M. Best

14 Attorneys for Plaintiff
15 FRANCISCA MORALEZ

ORDER

The Parties having so stipulated and good cause appearing,

IT IS HEREBY ORDERED that the last date Defendants may file their response to the complaint is September 12, 2017, and the Parties are to conduct the joint site inspection on October 11, 2017 at 1:00 p.m. All other dates triggered by the date of the joint site inspection are also continued accordingly. The case management conference statement is due on October 24, 2017, and the case management conference is rescheduled to October 31, 2017 at 2:00 p.m.

IT IS SO ORDERED.

Dated: September 6, 2017


HAYWOOD S. GILLIAM, JR.
United States District Judge